



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 21, 2023

By ECF

Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Scott, et al. v. United States*, 19-cv-1075 (ERK) (PK)

Dear Judge Kuo:

This Office represents defendant United States of America in the above-referenced matter. Defendant writes on behalf of all parties, and pursuant to the Court's Order of February 21, 2023 to provide a joint status report informing the Court of the progress since the parties last updated the Court on February 21, 2023, and to request a stay of discovery until April 17, 2023, to allow the parties to engage in further negotiations.

Following three mediation sessions before former Magistrate Judge Steven Gold over the past few months, the parties continue to make substantial progress toward reaching a potential settlement agreement. Since our last update on February 21, 2023 (Dkt. No. 204), the parties have exchanged proposals on the resolution of various outstanding terms of the proposed settlement. A further extension of all discovery deadlines will allow the parties to further negotiate all outstanding terms, in the hopes of reaching a final resolution in the near future.

Accordingly, the parties respectfully request that the Court stay discovery until April 17, 2023, to allow the parties to further negotiate the terms of their potential settlement agreement. We propose providing a joint status update to the Court on April 17, 2023.

We thank the Court for its consideration of this matter.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ electronically signed
Sean P. Greene-Delgado
Shana Priore
Paulina Stamatelos
Christopher Volpe
Philip DePaul
Assistant U.S. Attorneys
(718) 254-7503/6484/6008/6198/6188
sean.greene@usdoj.gov
philip.depaul@usdoj.gov
shana.c.priore@usdoj.gov
pauline.stamatelos@usdoj.gov
christopher.volpe@usdoj.gov

cc: All counsel of record (by ECF)